REMARKS

The Examiner rejected claim 19 based on the disclosure of U.S. Patent No. 6,282,194 to Cheeseman. The Examiner correctly points out that Cheeseman discloses a plurality of telephone exchanges ("access tandems") interconnected via a plurality of nodes. The Examiner seeks to identify the nodes of claim 19 with the interfaces SPM (40) of Cheeseman. It is felt that a more appropriate candidate for these nodes would be the ATM switches 52, 54, 56. However, the major distinction between Cheeseman and the present invention is that we claim communication between telephone exchanges via nodes that are "Routers using Internet Protocol". This is not found in Cheeseman who teaches a completely different arrangement.

Cheeseman is concerned with the bottleneck being formed by conventional trunk interconnection of telephone exchanges (see, col. 1, lines 30-35). Unlike the present invention, the solution according to Cheeseman lies in using ATM facilities (see, col. 2, lines 2-7).

In particular, it is clear that the interfaces of Cheeseman function to convert STM traffic to ATM and vice versa (see, col. 5, lines 20-29). No provision is made in Cheeseman for passing IP traffic through these interfaces, the ATM switches or any part of the central backbone network 50. In fact, the whole concept of Cheeseman is based on improved bearer capacity using ATM.

The Examiner states that the interface SPM 40 is a Router. However, this is not taught by Cheeseman. The Examiner seems to be saying that any equipment passing Internet Protocol traffic falls within the definition of a router. This is not supported by Cheeseman nor by reference works.

For example, "Desktop Encyclopaedia of Telecommunications", Nathan J. Muller, 2nd Edition (McGraw Hill 2000) defines a Router as "making intelligent packet-forwarding decisions", i.e., *deciding* on the route to be followed by received packets. The interfaces SPM 40 of Cheeseman clearly do not fall within this definition. It is conceivable that the skilled worker might consider adapting the SPM interface connected to Internet Protocol gateway IP G/W to translate between IP and ATM, although Cheeseman is silent on this point. What is clear from Cheeseman is that these interfaces merely translate protocol and do not take routing decisions. That the interfaces SPM do not take routing decisions is clear from the fact that they are connected between a single source and a single destination so that there is *no decision to be made*.

In summary, the cited prior art fails to teach the telecommunications system of claim 19 as it does not teach use of routers or any use of Internet Protocol in the interconnection of telephone exchanges. This leads to the conclusion that claim 19 is novel and not obvious when compared with the cited art. It is respectfully submitted that the Examiner's argument is traversed.

Claim 29 is directed to an adapter characterized by features equivalent to those of claim 19 and is also novel and not obvious when compared with the cited art.

Petition is hereby made for a one-month extension of the period to respond to the outstanding Official Action to April 30, 2004. A check in the amount of $110.00, as the Petition fee, is enclosed herewith. If there are any additional charges, or any overpayment, in connection with the filing of this response, the Commissioner is hereby authorized to charge any such deficiency, or credit any such overpayment, to Deposit Account No. 11-1145.

Wherefore, a favorable action is earnestly solicited.

Respectfully submitted,

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